

IN THE UNITED STATES DISTRICT COURT
FOR THE 22 Middle DISTRICT OF TENNESSEE
Columbia DIVISION

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SEP 27 2013

U.S. DISTRICT COURT

Colt chambers Name

Prison Id. No. 00384044

Name

Prison Id. No. _____

Plaintiff(s)

(List the names of all the plaintiffs
filing this lawsuit. Do not use "et
al." Attach additional sheets if
necessary.)

Civil Action No. _____
(To be assigned by the Clerk's
office. Do not write in this space.)

v.

Lawrence County Name

Administration, et al. Name

Defendant(s)

Jury Trial ☐ Yes ☐ No

(List the names of all defendants
against whom you are filing this
lawsuit. Do not use "et al." Attach
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
FILED PURSUANT TO 42 U.S.C. § 1983

I. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

- A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuits in the United States District Court for the Middle District of Tennessee, or in any other federal or state court?

☒ Yes

☐ No

- B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs

~~Lawrence County~~

Defendants

Lawrence County Administration / Sheriff's
Dept Thompson

2. In what court did you file the previous lawsuit? _____

(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)

3. What was the case number of the previous lawsuit? _____

4. What was the Judge's name to whom the case was assigned? _____

5. When did you file the previous lawsuit? _____ (Provide the year, if you do not know the exact date.)

6. What was the result of the previous lawsuit? For example, was the case dismissed, appealed, or still pending? _____

7. When was the previous lawsuit decided by the court? _____ (Provide the year, if you do not know the exact date.)

8. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit.

☐ Yes

☐ No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

II. THE PLAINTIFF'S CURRENT PLACE OF CONFINEMENT (The following information must be provided by each plaintiff.)

A. What is the name and address of the prison or jail in which you are currently incarcerated? Lawrence County Detention Center

B. Are the facts of your lawsuit related to your present confinement?

☒ Yes

☐ No

C. If you checked the box marked "No" in question II.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain.

D. Do the facts of your lawsuit relate to your confinement in a Tennessee State Prison?

☐ Yes

☒ No

If you checked the box marked "No," proceed to question II.H.

E. If you checked the box marked "Yes" in question II.D above, have you presented these facts to the prison authorities through the state grievance procedure?

☐ Yes ☐ No

F. If you checked the box marked "Yes" in question II.E above:

1. What steps did you take? _____

2. What was the response of prison authorities? _____

G. If you checked the box marked "No" in question II.E above, explain why not. _____

H. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)?

☒ Yes ☐ No

I. If you checked the box marked "Yes" in question II.H above, have you presented these facts to the authorities who operate the detention facility?

☒ Yes ☐ No

J. If you checked the box marked "Yes" in question II.I above:

1. What steps did you take? Filed grievance forms but there is not a grievance board forms disappeared

2. What was the response of the authorities who run the detention facility? either forms wasent returned or told they would check into it

L. If you checked the box marked "No" in question II.I above, explain why not. _____

Attach copies of all grievance related materials including, at a minimum, a copy of the grievance you filed on each issue raised in this complaint, the prison's or jail's response to that grievance, and the result of any appeal you took from an initial denial of your grievance.

III. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: Colt Chambers

Prison Id. No. of the first plaintiff: 00384044

Address of the first plaintiff: 240 West Gaines Lawrenceburg TN
38464

(Include the name of the institution and mailing address, including zip code.
If you change your address you must notify the Court immediately.)

2. Name of second the plaintiff: _____

Prison Id. No. of the second plaintiff: _____

Address of the second plaintiff: _____

(Include the name of the institution and mailing address, including zip code.
If you change your address you must notify the Court immediately.)

If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Jimmy Brown

Place of employment of the first defendant: Sheriff of Lawrence
County

The first defendant's address: 240 West Gaines Lawrenceburg
TN, 38464

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☐ Yes ☐ No

2. Name of the second defendant: LT. Dan Kellum

Place of employment of the second defendant: Lawrence County Sheriff's
Dept / Lawrence County Jail Administrator

The second defendant's address: 240 West Gaines Lawrenceburg TN
38464

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☐ Yes ☐ No

If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, their place of employment, their address, and the capacity in which you are suing them. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide their proper name, place of employment, and address, the Clerk will be unable to serve them should process issue.

Civil right to proper medical attention page 1
Suite 1

- ① On September 3, 2013; I informed nurse Misty Aderson that I had only went to the bathroom one time since August 28, 2013; and on that day I was given milk magnesium. I informed nurse Aderson that I was having alot of trouble, and was beginning to have stomach "cramps", and it wasn't normal for me to be having trouble with bowell movements. Misty Aderson did tell me on September 3, 2013; "stop asking for milk magnesium please." I then stated to her that the last time she gave it to me that it didn't help. She told me to fill out a medical request form, and that I would be put on stool softeners. I was kept on a stool softener for a period of three days from September 3, 2013, until September 6, 2013 and they didn't help. I was forced to spend the weekend without being able to speak to any medical personnel because almost hardly ever work on the weekends. Inmates such as myself are forced to be without medical attention because of the fact that when the nurses decide off or scheduled off that the correctional officers pass out medications. I can tell that they have no idea of what they are doing, so I feel this is not proper medical attention because the correctional officers aren't nurses.

page 2

There is no emergency sick call requests for inmates. When an inmate is in the hole there is no emergency call button to let the correctional officer know when an inmate is having an emergency. The window is closed by a flap on the outside of the door so the inmate can't see in or out of the door. There is no ventilation. If an inmate needs a correctional officers attention they are forced to Kick the door or yell if possible, this leads back to the point of no emergency call button. Monday morning I did ask Jennifer Gist for her to please put me on something else other than stool softeners because I hadn't had a bowel movement in the past eleven or twelve days. She said, "She would bring me something when she got done with med-call." She never returned. My witnesses are John C. Staggs and Coty Brown. On September 10, 2013, I asked nurse Jennifer ~~Elam~~ Elam if she had brought me anything or if she could please get me something because I was hurting really bad. I was almost to the point of where I couldn't even eat my breakfast. Then, she got smart by saying, "ask the next med-call nurse; which wasn't until after 2pm. I told her, "I can't sleep and am in a lot of pain and need emergency medical attention now.

page 3

This is when I replied "I am going to file a lawsuit on medical for not helping me." She told me, "I wouldn't be able to sue her for anything; and my smart mouth just got more time in the hole. I recieved four more days after this incident. I sent Sgt. Jamie Mahar a grievance form about what the medical staff had done to me and, also; that I was filing a lawsuit. On the morning of September 11, 2013; after going thirteen or fourteen days without a bowell movement and being in severe pain, nurse Jennifer Elam gave me a bottle of magnesium citrate. On September 18, 2013, Sgt. Jamie Mahar called me to his office and stated to me "he made the nurses give me the magnesium citrate." This did happen in the Lawrence County Detention Center.

Civil rights violation

page 4

② Chambers vs marks / "Administration"

It can prove that between Sept.
5th 2013 and Sept 16th 2013 that C/o
Josh marks violated my Civil rights
by giving me the wrong medication,
and not giving me sick call forms
not giving me toilet paper, denying
me the right to share on purpose
knowing i had to go to Court, and
stating he hoped they gave me 20[#]
years for going to Court um shared
it have 2 people who where in the
here with me that he gave razors
and toilet paper too who witnessed
these things take place i spent alot
of time in pain cause i was unable
to get a sick call or even get
C/o marks to let me speak to a
shift SBT this man caused me to
almost loose my mind in Solitary
Confinement with out any rights to a
sick call i went to the jail
Administration Chair this it did no good!
This happend in Lawrence County Detention Center

Over Crowding / Unsanitary Conditions

el was transported to the Lawrence County Detention Center on August 14th 2013. I was placed in Cell B110. I was forced to lay my mat on a nasty floor cause they where no open beds it had 16 people they was 29 in the Cell "pod" I had to lay right in the path of the bathroom which forced people to have to wake me up to go to the restroom I could never sleep! and the smell from the rest room was almost enough to make me vomit! they where only 2 toilets for 29 people it made no difference if you cleaned or not there was to many people on the floor! I received no tooth brush for 2 weeks so with me being a state inmate I fear my rights have been violated to be made to live like this this did and still is happening in the Lawrence County Detention Center.

Opening Statements

On September 5th, 2013; my cell inmate, John C. Staggs and I was put on lock-down by Sgt. Gary Wells. John Staggs is the one who recieved the tray, but, I was also placed in lock-down just because he gave me half of it! While on lock-down; I can prove my civil rights were violated several times. I was denied medical attention, and I was in severe pain for many days; while officers looked away, or looked at me laughing. Also, they denied me medical, grievance, and request forms. On the days that razors were passed out, they denied me razors; forcing me to go to court unshaved; therefore, I wasn't able to present my-self to the court in a presentable manner. I have logged every one of these actions that were made against me by the employees of the Lawrence County Detention Center. Dates, times, actions, and witnesses are included. I, Colt Chambers, am seeking relief from the Lawrence County Detention Center and its administration, because I hold them responsible for their employees' actions.

Extra Defendants!

Sgt. Jamie Maher - Lawrence County
Detention Center / Jail Administration 240
West Gaines Lawrence County TN, 38464

I Request a Jury trial on all 3

Suits

Car Chambers

Extra Defendants whom I am bringing my lawsuit

Josh Marks - Lawrence County Detention Center is the place of employment the address to which to be reached is 240 West Gaines Lawrence County TN, 38464 and he is being named in official capacity

Jennifer Gist - Lawrence County Jail Medical / Administration 240 West Gaines Lawrence County TN, 38464

Jennifer Elam - Lawrence County Jail Medical / Administration 240 West Gaines Lawrence County TN, 38464

Misty Anderson - Lawrence County Jail - Medical / Administration 240 West Gaines Lawrence County TN, 38464

RELIEF REQUESTED

I Request a jury trial



Yes

No

VI. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: Cox Chambers Date: 9-27-13

Prison Id. No. 00384044

Address: 240 West Gaines Lawrence County TN, 38464

(Include the city, state and zip code.)

Signature: _____ Date: _____

Prison Id. No. _____

Address: _____

(Include the city, state and zip code.)

ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information listed above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN FORMA PAUPERIS, if not paying the civil filing fee.

SUBMIT THE COMPLAINT, THE REQUIRED FILING FEE, OR APPLICATION TO PROCEED IN FORMA PAUPERIS, TOGETHER. Complaints received without the required filing fee or application to proceed *in forma pauperis* will be returned. Filing fees, or applications to proceed *in forma pauperis*, received without a complaint will be returned.